

**IN THE DRAWINGS:**

To overcome the Office Action's objection of the drawings, Applicants concurrently file herewith a Submission of Formal Replacement Drawings with two (2) sheets of replacement drawings to substitute for the original filed drawing sheets. The new formal drawings amend Figs. 17-19 to add the legend "Prior Art", as suggested by the Examiner.

**REMARKS****Summary of the Office Action**

In the Office Action, claims 12 and 14-18 are objected to because of informalities.

Claims 1-3, 6-8, 11, 18 and 19 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,778,287 to *Yu*.

Claims 4, 5, 9, 10 and 12-16 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims.

The title is objected to for not being descriptive.

The drawings and specification are objected to for certain informalities.

**Summary of the Response to the Office Action**

Applicants wish to thank the Examiner for the allowance of claim 17 and the indication that claims 4, 5, 9, 10 and 12-16 would be allowable a free written in independent form.

Applicants propose amending claims 12 and 14-18 to correct certain informalities.

Applicants propose amending claim 1 to clarify the understanding of the invention.

Accordingly, claims 1-19 are pending for further consideration.

**Objection to the Title**

The title was objected to for not being descriptive of the invention. Applicants propose submitting a new title as suggested in the Office Action, as shown above. Accordingly, Applicants respectfully request withdrawal of the objection to the title.

**Drawings**

To overcome the Office Action's objection of the drawings, Applicants concurrently file a Submission of Formal Replacement Drawings with two (2) sheets of replacement drawings to substitute the original filed drawing sheets. The new formal drawings amend Figs. 17-19 to include the label "Prior Art." Applicants respectfully request that the objection to the drawings be removed. **Claim Informalities**

Informalities in claims 12 and 14-18 have been corrected. The objection to these claims under 37 CFR § 1.75(a) is respectfully traversed. Applicants respectfully submit that these claims, as amended, are in condition for allowance.

**All Subject Matter Complies With 35 U.S.C. § 102(b)**

Claims 1-3, 6-8, 11, 18 and 19 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,778,287 to *Yu*. Applicants respectfully traverse the rejection for the following reasons.

Applicants respectfully submit that the Office Action has not established that *Yu* anticipates each and every feature of Applicants' claimed invention and that all rejections under 35 U.S.C. § 102(b) should be withdrawn. Namely, Applicants contend that independent claim 1 recites the features of "at least one driving force transmitting member arranged in a driving force transmission path for transmitting the driving force to the image carrying member; and a rotating member for rotating in contact with one of the driving force transmitting member and the image carrying member." At least these features are not disclosed or taught by *Yu*.

*Yu* discloses a photographic imaging apparatus including a first rotatable belt support roller and a second rotatable belt support roller that supports a drive belt and a belt driving

device that simultaneously pushes and pulls the drive belt. See Abstract of *Yu*. However, the *Yu* fails to teach or suggest at least the above-mentioned features of claim 1.

The Office Action states that *Yu* discloses “a driving device 50 . . . a photoreceptor belt 10 (i.e., image carrying member . . . for rotationally driving the photoreceptor belt by transmitting a rotational driving force of a motor 60 (i.e., driving power source) . . . a second roller 48 (i.e., rotating member; second driving unit) for rotating in contact with at least one of the first roller 47 (i.e., driving force transmitting member; first driving unit) and the photoreceptor belt.” Because *Yu* does not disclose the features of “at least one driving force transmitting member arranged in a driving force transmission path for transmitting the driving force to the image carrying member; and a rotating member for rotating in contact with one of the driving force transmitting member and the image carrying member,” it cannot anticipate the invention recited in claim 1.

That is, the Office Action fails to explain how the so-called rotating member “second roller 48” rotates in contact with at least one of a so-called driving force transmitting member “first roller 47” and the image carrying member “photoreceptor belt 10.” Under the rubric stated in the Office Action, the so-called rotating member i.e., second roller 48 is not in contact with at least one of the so-called driving force transmitting member i.e., the first roller 47. Thus, *Yu* cannot anticipate the invention recited in claim 1.

With regard to independent claim 18, the Office Action states that *Yu* discloses “a second roller 48 (i.e., rotating member; second driving unit) for rotating in contact with at least one of the first roller 47 (i.e., driving force transmitting member; first driving unit).” Contrary to the Office Action, *Yu* does not disclose a first and second driving unit as asserted. The Office

Action improperly asserts that the so-called second driving unit 48 and so-called first driving unit 47 are driving units at all. Both of these “rollers” were previously described in the Office Action as other components. Further, both rollers are merely followers because they only rotate when the belt driving device 50 rotates a pulley 62 which rotates the photoreceptor belt 10. Neither roller 47 nor 48 drives anything at all. See col. 2 lines 10-59 of *Yu*.

Applicants contend that newly amended independent claim 18 recites the features of “a first driving unit for rotating the endless member; and a second driving unit connected to the endless member and applying a driving force with substantially the same rotation number as the first driving unit,” and at least the features are not present in *Yu*. Therefore, Applicants respectfully submit that the Office Action has not established that *Yu* anticipates each and every feature of Applicants’ claimed invention and that all rejections under 35 U.S.C. § 102(b) should be withdrawn.

As pointed out in MPEP § 2131, a claim is anticipated by a prior art reference only if each and every element as set forth in the claim is found. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051 (Fed. Cir. 1987). Therefore, Applicants respectfully assert that the rejection under 35 U.S.C. § 102(b) should be withdrawn because *Yu* does not teach or suggest each feature of independent claims 1 and 18.

Additionally, Applicants respectfully submit that dependent claims 2-3, 6-8, 11, and 19 are also allowable insofar as they recite the patentable combinations of features recited in claims 1 and 18, as well as reciting additional features that further distinguish over the applied prior art.

**CONCLUSION**

In view of the foregoing, Applicants respectfully request reconsideration and timely allowance of the pending claims. Should the Examiner believe that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

**MORGAN, LEWIS & BOCKIUS LLP**

By: \_\_\_\_\_



David B. Hardy  
Reg. No. 47,362

Dated: July 27, 2005

**CUSTOMER NO. 09629**  
**MORGAN, LEWIS & BOCKIUS LLP**  
1111 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Telephone: (202) 739-3000  
Facsimile: (202) 739-3001